

Exhibit 4

In the Matter Of:

Hammons vs University of Maryland Medical System

1:20-CV-02088-DKC

FATHER LOUIS ASOBI

April 11, 2022



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FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

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1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 -----x

4 JESSE HAMMONS,)

5 Plaintiff,)

6 v.) Case No.

7 UNIVERSITY OF MARYLAND MEDICAL) 1:20-CV-02088-DKC

8 SYSTEM CORPORATION, et al.,)

9 Defendants.)

10 -----x Pages 1-108

11
12 REMOTE VIDEOTAPED DEPOSITION OF

13 FATHER LOUIS ASOBI

14 Monday, April 11, 2022

15 Towson, MD

16
17
18 Reported by: Sherry L. Brooks

19 Certified LiveNote Reporter

20
21 Job No. J8078715

22

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

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April 11, 2022

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10:03 a.m.

3

4

5 Remote videotaped deposition via Zoom

6 videoconferencing of Father Louis Asobi at:

7

8

Towson, MD

9

10 Pursuant to notice, before Sherry L. Brooks,

11 Certified LiveNote Reporter and Notary Public, in and

12 for the State of Maryland.

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Hammons vs University of Maryland Medical System

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1 ON BEHALF OF PLAINTIFF:

2 Joshua M. Goldman, Esquire

3 Jonathan S.Z. Hermann, Esquire

4 1133 Avenue of the Americas

5 New York, NY 10036

6 (212) 336-2000

7 E-mail: JGoldman@pbwt.com

8 E-mail: JHermann@pbwt.com

9

10 ON BEHALF OF DEFENDANTS:

11 Hannah Wigger, Esquire

12 Sheppard Mullin

13 2099 Pennsylvania Avenue, NW

14 Suite 100

15 Washington, DC 20006

16 (202) 747-1900

17 E-mail: HWigger@SheppardMullin.com

18

19 ALSO PRESENT:

20 George Ellis, Videographer

21

22

1	C O N T E N T S	
2	EXAMINATION OF FATHER LOUIS ASOBI	PAGE
3	BY MR. GOLDMAN	6
4		
5		
6		
7	EXHIBITS	PAGE
8	Exhibit 1 Ethical and Religious Directives for	87
9	for Catholic Health Care Services	
10	Sixth Edition	
11	Exhibit 2 Transgender Issues in Catholic Health	88
12	Care	
13		
14		
15		
16		
17	(Exhibits attached to transcript.)	
18		
19		
20		
21		
22		

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

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1 P R O C E E D I N G S

2 - - -

3 THE VIDEOGRAPHER: We are now on the
4 record. The time is 10:03 Eastern Standard Time on
5 April 11th, 2022. This begins the videoconference
6 deposition of Reverend Louis Asobi taken in the
7 matter of Jesse Hammons versus the University of
8 Maryland Medical System Corporation, et al., filed in
9 the United States District Court for the District of
10 Maryland. The case is number 1:20-CV-02088-DKC.

11 My name is George Ellis. I am the remote
12 videographer. The court reporter is Sherry Brooks.
13 We are both representing Esquire Deposition
14 Solutions.

15 Counsel, will you please state your name
16 and who you represent, after which, the court
17 reporter will swear in the witness.

18 MR. GOLDMAN: Good morning. This is
19 Joshua Goldman from the law firm Patterson Belknap.
20 I represent the plaintiff in this matter, Jesse
21 Hammons.

22 MS. WIGGER: Good morning. My name is

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

6

1 Hannah Wigger from Sheppard Mullin. I represent
2 defendants.

3 - - -

4 This deposition is being held via
5 videoconferencing equipment. The witness and
6 reporter are not in the same room. The witness has
7 been sworn in remotely pursuant to agreement of all
8 parties. The parties stipulate that the testimony is
9 being given as if the witness was sworn in person.

10 * * * *

11 FATHER LOUIS ASOBI

12 was called for examination by counsel and, after
13 having been duly sworn by the Notary, was examined
14 and testified as follows:

15 EXAMINATION BY COUNSEL FOR PLAINTIFF

16 BY MR. GOLDMAN:

17 Q. Good morning, Father Asobi.

18 A. Good morning. How are you?

19 Q. I'm good. How are you, sir?

20 A. I'm doing well, thank you.

21 Q. Thank you for taking the time to answer my
22 questions this morning.

1 Integration?

2 A. My role --

3 MS. WIGGER: Object to form -- sorry.

4 Make sure you pause for just a second to
5 let me object. Object to form.

6 You may go ahead and answer.

7 A. My job as vice president of Mission
8 Integration is -- it encompasses the entire
9 organization because the hospital where I'm the vice
10 president was established by the Sisters of Saint
11 Joseph of -- of Philadelphia, and they have a
12 mission, they have a vision, and they have values.

13 My role is to educate all employees on the
14 vision, the mission, and the values and to make sure
15 that all employees understand what the patrimony of
16 the founding congregation is and for us to live out
17 that tradition and their culture.

18 BY MR. GOLDMAN:

19 Q. And day-to-day, what are your
20 responsibilities as vice president for Mission
21 Integration?

22 A. Day-to-day, I oversee the implementation

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

16

1 of the ethical and religious directives as it affects
2 the delivery of care at Saint Joseph's and also to be
3 sure that we maintain the Catholic identity.

4 I also supervise the chaplains. I sit
5 as -- as a chair of the Institutional Ethics
6 Committee and the Catholic Identity Committee and I'm
7 also part of the executive (sic) in the operations of
8 the hospital.

9 Q. Thank you. And in that role, do you
10 interact directly with the archdiocese?

11 A. Yes.

12 Q. Can you describe that interaction for me?

13 A. The interaction I have with the
14 archdiocese is that I'm like the liaison between the
15 archdiocese and the hospital. So I am there to be
16 sure that the hospital, Saint Joseph Medical Center,
17 remains Catholic.

18 And if there are (sic) anything that is
19 happening that is not in line with the ethical and
20 religious directives, it's my responsibility to
21 inform the archdiocese and have a meeting with their
22 bishop or his designee to iron out things so that we

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

17

1 continue to practice medicine from the lens of
2 Catholic theology and Catholic identity.

3 Q. And at Saint Joseph's, who do you report
4 to?

5 A. I report to the president and the CEO.

6 Q. Is that Tom Smyth?

7 A. Yes.

8 Q. Do you report to anyone else at Saint
9 Joseph's?

10 A. No.

11 Q. Do you ever report to the board at Saint
12 Joseph's?

13 A. No.

14 Q. Do you report to anyone at the University
15 of Maryland Medical, UMMS?

16 A. No.

17 Q. Do you have anybody reporting to you?

18 A. In what area are you asking? Is it UMMS
19 or the University of Maryland Saint Joseph Medical
20 Center?

21 Q. Well, let's do Saint Joseph's first. Does
22 anybody report to you?

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

18

1 A. Yes, just the chaplains report to me.

2 Q. The chaplains. And who are those people?

3 A. The chaplains -- there are -- there are
4 eight of them in number. Some are full-time; some
5 are flex chaplains. And I have an assistant, a
6 pastoral care assistant. They all report to me.

7 Q. Does anybody else at Saint Joseph's report
8 to you?

9 A. No.

10 Q. Does anybody at UMMS report to you?

11 A. No.

12 Q. Do you have authority over any of the
13 medical staff at Saint Joseph's?

14 MS. WIGGER: Object to form.

15 A. No, I don't.

16 BY MR. GOLDMAN:

17 Q. Do you have authority over any other staff
18 at Saint Joseph's?

19 MS. WIGGER: Object to form.

20 A. No, I don't.

21 BY MR. GOLDMAN:

22 Q. Do you serve on any committees at Saint

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

19

1 Joseph's?

2 A. I do.

3 Q. What committees do you serve on?

4 A. Catholic Identity Committee and the
5 Institutional Ethics Committee.

6 Q. Saint Joseph is a Catholic hospital,
7 right?

8 A. Yes.

9 Q. To your understanding, what does it mean
10 to be a Catholic hospital?

11 MS. WIGGER: Object to form.

12 A. To be a Catholic hospital means that the
13 practice of medicine in that hospital has to be in
14 line with the ethical and religious directives as put
15 together by the United States Bishop's Conference and
16 that hospital also has to practice medicine in line
17 with Catholic theology and Catholic identity.

18 BY MR. GOLDMAN:

19 Q. And your job is to ensure that Saint
20 Joseph's maintains its Catholic identity; is that
21 right?

22 MS. WIGGER: Object to form.

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

20

1 A. Yes.

2 BY MR. GOLDMAN:

3 Q. I'm sorry. Can you repeat the answer?

4 A. I said yes.

5 Q. Thank you. I think your counsel has a
6 little bit of a delay, so when she objects, if you
7 could just wait a moment and then give the answer so
8 that the court reporter can hear it.

9 A. Thank you.

10 Q. Thanks. Is Saint Joseph's accredited by
11 any entity as a Catholic hospital?

12 A. Yes.

13 Q. What entity would that be?

14 A. Catholic Health Association.

15 Q. And what is the Catholic Health
16 Association?

17 A. The Catholic Health Association is the
18 umbrella that all Catholic hospitals belong to and
19 they pay their dues there. The corporate
20 headquarters is in St. Louis, Missouri.

21 And the summer (phonetic) association has
22 a program of education for all leaders in Catholic

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

37

1 on the handbook.

2 We provide them all this, they go through
3 it. If they have any question in the handbook, they
4 approach HR. The same way we're providing this
5 document, if they have any question, they approach
6 me.

7 BY MR. GOLDMAN:

8 Q. So is it fair to say that an employee of
9 Saint Joseph's, when they start, they receive
10 orientation that includes the ERDs, but after that
11 there's no requirement that they receive training in
12 it?

13 Is that fair to say?

14 MS. WIGGER: Object to form.

15 A. Well, I'm still new here, so I've yet to
16 see how things happen. But the fact is that
17 everybody's oriented. Do you understand what I said?
18 Every organization has a handbook, even the company
19 you work for, and everybody is provided with the
20 handbook.

21 If they have any question, they approach
22 HR. If they have any question with the ERD, they

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

38

1 know who to go to, and that has been what I've seen.

2 That has been going on since I've been here.

3 BY MR. GOLDMAN:

4 Q. Understood.

5 Just to confirm, after orientation there
6 is no requirement, as far as you know, that anyone
7 receive any training, correct?

8 A. I don't know the answer to the question
9 because I don't know what happens after that. I
10 haven't been here for a long time to give you an
11 answer beyond what I have just said.

12 Q. In your time at Saint Joseph's, you
13 haven't seen any required formal training, have you?

14 MS. WIGGER: Object to form.

15 A. I have not yet seen.

16 BY MR. GOLDMAN:

17 Q. Okay. And just to clarify, you began in
18 your position as vice president of Mission
19 Integration at the end of 2020?

20 A. At the end of 2019.

21 Q. Okay. Now, does Saint Joseph's give out
22 copies of the ERDs to staff with their orientation?

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

39

1 A. The orientation we do right now is online
2 due to COVID. We haven't done it in person, and the
3 copy of that document -- with every other document
4 for orientation it is in our intranet, and every
5 employee is advised to go to those websites and print
6 out those documents or read them by themselves in
7 that intranet.

8 So just the same way we provide every
9 other document for orientation, the same way we
10 provide the ERD, and it's all -- the entire document
11 is on our internal website for all employees.

12 Q. Have any physicians ever requested a copy
13 of the ERDs from you?

14 A. They don't come directly to me. The
15 recruiter who orients the providers provide them with
16 the -- with a copy of the ERDs.

17 Q. Okay. Stepping back a little bit, in
18 general, is the Catholic hospital required to follow
19 the ERDs?

20 MS. WIGGER: Object to form.

21 A. Yes.

22 BY MR. GOLDMAN:

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

40

1 Q. And why is that?

2 MS. WIGGER: Object to form.

3 A. That is what keeps them Catholic.

4 BY MR. GOLDMAN:

5 Q. Is Saint Joseph's required to follow the
6 ERDs?

7 MS. WIGGER: Object to form.

8 A. Yes.

9 BY MR. GOLDMAN:

10 Q. Why is Saint Joseph's required to follow
11 the ERDs?

12 MS. WIGGER: Object to form.

13 A. Because Saint Joseph's is a Catholic
14 hospital.

15 BY MR. GOLDMAN:

16 Q. Is Saint Joseph's required to follow the
17 ERDs in order to maintain an accreditation as a
18 Catholic hospital?

19 MS. WIGGER: Object to form.

20 A. It has to keep the ERDs to remain
21 Catholic.

22 BY MR. GOLDMAN:

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

41

1 Q. And who requires Saint Joseph's to follow
2 the ERDs?

3 MS. WIGGER: Object to form.

4 A. The hospital itself is Catholic, so the
5 hospital requires itself to keep to whatever that
6 makes them Catholic.

7 BY MR. GOLDMAN:

8 Q. Does any entity require Saint Joseph's to
9 follow the ERDs?

10 MS. WIGGER: Object to form.

11 A. Saint Joseph's is required to keep to the
12 ERDs because it's a Catholic hospital.

13 BY MR. GOLDMAN:

14 Q. So is it fair to say that no particular
15 entity requires Saint Joseph's to follow the ERDs?

16 MS. WIGGER: Object to form.

17 A. Saint Joseph's is a Catholic hospital. By
18 being a Catholic hospital, they are required to
19 follow not only the ERDs but the Catholic theology
20 and the Catholic identity.

21 BY MR. GOLDMAN:

22 Q. That wasn't my question. Let me ask it

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

42

1 again.

2 A. Okay.

3 Q. Is it fair to say that there is no entity
4 that requires Saint Joseph's to follow the ERDs? Yes
5 or no.

6 MS. WIGGER: Object to -- sorry. Object
7 to form.

8 A. The Catholic church requires Saint
9 Joseph's to keep the liturgist (phonetic) of the
10 church.

11 BY MR. GOLDMAN:

12 Q. Okay. Thank you. So the Catholic church
13 requires Saint Joseph's to follow the ERDs?

14 MS. WIGGER: Object to form and to
15 mischaracterizing testimony.

16 BY MR. GOLDMAN:

17 Q. You can answer, Father.

18 A. Saint Joseph's is a Catholic hospital,
19 which I've repeated more than three times. It's a
20 Catholic hospital. And because of that, they are
21 required to keep to the ERDs.

22 Q. Is Saint Joseph's required to follow the

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

43

1 ERDs by any contracts that it's entered into?

2 MS. WIGGER: Object to form.

3 You may answer in your personal knowledge.

4 A. I have no idea about any contract.

5 BY MR. GOLDMAN:

6 Q. Do you know how the requirement to follow
7 the ERDs is enforced?

8 A. I'm not clear with your question.

9 Q. You mentioned that Saint Joseph's is
10 required to follow the ERDs, correct?

11 A. Yes.

12 Q. And you mentioned that Saint Joseph's is
13 required to follow the ERDs because it's a Catholic
14 hospital, correct?

15 MS. WIGGER: Object to form.

16 A. Yes.

17 BY MR. GOLDMAN:

18 Q. I want to know how that requirement is
19 enforced at Saint Joseph's.

20 MS. WIGGER: Object to form.

21 A. I don't know of any particular design or
22 form, but everybody who works at Saint Joe's is

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

44

1 oriented to the document and they know the do's and
2 don'ts of the ERDs. And that is the way we -- Saint
3 Joe's has been practicing medicine, and also the
4 employees understand that.

5 BY MR. GOLDMAN:

6 Q. Thank you.

7 And aside from the ERDs, is there any
8 other set of religious guidance documents that Saint
9 Joseph's is required to follow?

10 MS. WIGGER: Object to form.

11 A. Saint Joseph's is required to follow the
12 Catholic theology which can be interpreted as a
13 Catholic identity, what makes the hospital Catholic.

14 BY MR. GOLDMAN:

15 Q. I'll ask the question again: Is there any
16 other guidance document that Saint Joseph's is
17 required to follow, aside from the ERDs?

18 MS. WIGGER: Object to form.

19 A. The Catholic identity.

20 BY MR. GOLDMAN:

21 Q. Is that a guidance document?

22 A. Yes.

FATHER LOUIS ASOBI

Hammons vs University of Maryland Medical System

April 11, 2022

104

1 CERTIFICATE OF NOTARY PUBLIC

2 I, SHERRY L. BROOKS, a Notary Public in
3 and for the STATE OF MARYLAND, before whom the
4 foregoing deposition was taken, do hereby certify
5 that the witness whose testimony appears in the
6 foregoing deposition was duly sworn by me; that the
7 testimony of said witness was taken by me in
8 Shorthand at the time and place mentioned in the
9 caption hereof and thereafter transcribed by me; that
10 said deposition is a true record of the testimony
11 given by said witness remotely via Zoom
12 videoconferencing; that I am neither counsel for,
13 related to, nor employed by any of the parties to the
14 action in which this deposition was taken; and
15 further, that I am not a relative or employee of any
16 counsel or attorney employed by the parties hereto,
17 nor financially or otherwise interested in the
18 outcome of this action.



19
20 SHERRY L. BROOKS
21 Notary Public in and for
22 STATE OF MARYLAND

22 My commission expires: July 9, 2023

ACKNOWLEDGMENT OF DEPONENT

ASSIGNMENT NO.: J8078715

CASE CAPTION: JESSE HAMMONS - V - UNIVERSITY OF MARYLAND MEDICAL SYSTEM CORP., ET AL.

DEPONENT: FATHER LOUIS ASOBI

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the 23 day of May, 2022.

FATHER LOUIS ASOBI

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Hammons vs University of Maryland Medical System

April 11, 2022

106

1 DEPOSITION ERRATA SHEET

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4 Reason for change: Typographical Error5 Page No. 13 Line No. 18 Change to: "2020" to "2021"6 _____
7 Reason for change: Typographical Error8 Page No. 13 Line No. 22 Change to: "2019" to "2020"9 _____
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22 FATHER LOUIS ASOBI

FATHER LOUIS ASOBI
Hammons vs University of Maryland Medical System

April 11, 2022
107

1 DEPOSITION ERRATA SHEET

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Hammons vs University of Maryland Medical System

April 11, 2022

108

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